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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 21 00162-WHO
)	
Plaintiff,)	STIPULATION AND ORDER FOR A FINDING OF
)	EXCLUDABLE TIME UNDER THE SPEEDY
v.)	TRIAL ACT FOR DEFENDANT MAVROMATIS
)	
BABAK BROUMAND AND)	
MALAMATENIA MAVROMATIS)	
)	
Defendant.)	

It is hereby stipulated by and between counsel for the United States and defendant MALAMATENIA MAVROMATIS, by and through her counsel Paul H. Nathan, that time be excluded under the Speedy Trial Act from April 19, 2022 through August 25, 2022.

STIPULATION

The parties hereby stipulate that excludable time under the Speedy Trial Act exists in this case.

1 The defendant is not in custody. The parties believe there is good cause for the excludable time based
2 on the following facts:

3 1. Defendant MAVROMATIS first appeared in this case on April 19, 2022, following the
4 filing of a superseding indictment in which she was charged with two counts of False Statements on a
5 Loan Application in violation of 18 U.S.C. § 1014 (Counts Four and Six). Prior to defendant
6 MAVROMATIS's indictment, co-defendant BABAK BROUMAND had already been charged and an
7 August 25, 2022 status conference had been set by the Court.

8 2. During defendant MAVROMATIS's arraignment, the parties stipulated to continue the
9 matter to the August 25, 2022 status conference already set for defendant BROUMAND.

10 3. The case against defendant BROUMAND is related to an ongoing federal prosecution in
11 the Central District of California, *United States v. Broumand*, CR 20-224(A)-RGK, which is set for trial
12 on June 14, 2022.

13 4. Defendant MAVROMATIS wants to have the trial in the Central District take place
14 before any trial in this case.

15 5. The government is in the process of producing over 60,000 pages of discovery to
16 defendant MAVROMATIS, which primarily consists of business records, including bank, credit card,
17 mortgage broker, title company, and escrow company records, tax returns, and witness interview reports.

18 6. The government and counsel for defendant MAVROMATIS agree that time should be
19 excluded under the Speedy Trial Act so that defense counsel can prepare, including by reviewing the
20 discovery and consulting with defendant.

21 7. The parties stipulate and agree that excluding time from April 19, 2022 to August 25,
22 2022, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The
23 parties further stipulate and agree that the ends of justice served by excluding the time from April 19,
24 2022, through August 25, 2022, from computation under the Speedy Trial Act outweigh the best
25 interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).
26 Additionally, defendant MAVROMATIS is joined for trial with codefendant BROUMAND as to whom
27 the time for trial has not run and no motion for severance has been granted. 18 U.S.C. § 3161(h)(6).

28 The undersigned Assistant United States Attorneys certify that they have obtained approval from

counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: May 18, 2022

/s/ Ruth C. Pinkel
RUTH C. PINKEL
MICHAEL J. MORSE
Special Assistant United States Attorneys

DATED: May 18, 2022


/s/ [via email authorization]
PAUL H. NATHAN
Counsel for Defendant

ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court finds that failing to exclude the time from April 19, 2022, through August 25, 2022 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from April 19, 2022, to August 25, 2022, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from April 19, 2022, through August 25, 2022, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §§ 3161(h)(6), (h)(7)(A), and (h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: May 23, 2022


THE HONORABLE WILLIAM H. ORRICK
United States District Judge